

## **EXHIBIT A**

SCHUMANN, RALLO & ROSENBERG, LLP

ATTORNEYS AT LAW

KIM SCHUMANN  
THOMAS C. RALLO  
DAVID R. ROSENBERG

JEFFREY P. CUNNINGHAM  
TIFFANY T. LY  
BRADLEY R. MATHEWS  
STEPHANIE M. TRAN  
ERIC AREVALO  
STEPHANIE B. SAUNDERS  
PETER COOK  
CHARLES D. LAWRENCE

MICHAEL C. HERZOG  
ARTHUR J. TRAVIESO  
KENNETH L. MARIBOHO II  
EDYE HILL  
DAVID P. REID  
SHARMAH L. BROOKS  
ROBERT J. SULLIVAN  
HEATHER BROWN-SMITH  
ERIC C. BRADLEY

3100 BRISTOL STREET  
4<sup>TH</sup> FLOOR  
COSTA MESA, CALIFORNIA 92626  
TELEPHONE: (714) 850-0210  
FACSIMILE: (714) 850-0551  
www.srrlawfirm.com

RIVERSIDE COUNTY OFFICE  
3890 ELEVENTH STREET, SUITE 214  
RIVERSIDE, CALIFORNIA 92501  
TELEPHONE: (714) 850-0210

July 14, 2011

**Via U.S. Mail & Facsimile: (610) 894-7659**

**Via Email: philjberg@gmail.com**

Philip J. Berg, Esq.  
LAW OFFICES OF PHILIP J. BERG  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531

Re: Liberi v. Taitz  
Our File No.: CH-078

Dear Mr. Berg:

Our offices have been retained to represent Yosef Taitz in the above-reference lawsuit. Mr. Taitz is due to file his responsive pleadings to your First Amended Complaint on July 19, 2011.

The First Amended Complaint, as filed against Mr. Taitz, completely disregards a prior Court Order in this matter, signed on May 28, 2009, that requires Plaintiffs to apply to the Court for leave to add Mr. Taitz as a defendant in this matter. Specifically, the Court Order states: "**Leave shall be granted on the Court's finding that Plaintiff have established evidence sufficient to support a cognizable claim against Defendant Yosef Taitz.**" A copy of the 5/28/09 Court Order has been attached herein for your reference. You have clearly failed to obtain the necessary Court authorization to add Mr. Taitz as a party in this matter.

Please be advised that your improper naming of Mr. Taitz, in *direct violation* of the prior Court Order, has not been well-received. Plaintiffs must dismiss Mr. Taitz immediately, otherwise Mr. Taitz will exercise his rights in dismissing this matter against him. Mr. Taitz will seek sanctions against each of the Plaintiffs in this matter, including against you for this improper conduct against him.

As such, consider this letter a meeting and conference under Local Rule 7-3, that Mr. Taitz intends on filing a Motion to Dismiss and Strike the First Amended Complaint under FRCP 12(b)(6) and 12(f), and further intends on seeking sanctions against each of the Plaintiffs. Please advise our office immediately if you agree to dismiss Mr. Taitz from this matter.

"A"

Philip J. Berg, Esq.

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You may still file a motion, pursuant to the 5/28/09 Court Order, to add Mr. Taitz as a Defendant in this matter upon a Court Order that you have established evidence sufficient to state a claim against him.

Thank you for your time and attention to this important matter. You can reach me at (714) 850-0210, or by email at [pcook@srllawfirm.com](mailto:pcook@srllawfirm.com).

Very truly yours,

**SCHUMANN, RALLO & ROSENBERG, LLP**

A handwritten signature in black ink, appearing to read 'P. Cook', with a stylized, cursive flourish.

PETER COOK

PC/ml  
Enclosure

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Law Offices of:  
Philip J. Berg, Esquire  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
Identification No. 09867.  
(610) 825-3134

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT,  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al,

Plaintiffs

vs.

ORLY TAITZ, et al,

**FILED**  
Case No.: 09-cv-01898-ECR  
MAY 28 2009  
MICHAEL E. KUNZ, Clerk  
Defendants. Dep. Clerk

**STIPULATED DISMISSAL WITHOUT PREJUDICE**

**OF DEFENDANT YOSEF TAITZ**

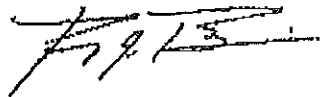
AND NOW, Plaintiffs, Lisa Liberi, Philip J. Berg, Esquire, Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella and Go Excel Global and Defendant, Yosef Taitz, through their undersigned counsel hereby stipulate and agree as follows:

1. All claims against Defendant Yosef Taitz are hereby Dismissed without Prejudice.
2. Plaintiffs may apply to the Court for leave to join Defendant Yosef Taitz in this action upon satisfaction of all applicable joinder rules and leave of Court. Leave shall be granted only upon the Court's finding that Plaintiffs have established


evidence sufficient to support a cognizable claim against Defendant Yosef Taitz arising out of the allegations in the Complaint filed May 4, 2009. No application for leave to join Defendant Yosef Taitz shall be made later than sixty [60] days before the close of discovery.

3. In the event the Court grants leave to join Defendant Yosef Taitz in this action, Yosef Taitz shall be permitted to assert all defenses available to him as of the date of this stipulation, including but not limited to defenses based upon failure to state a claim and expiration of any applicable statute of limitations.
4. Defendant Yosef Taitz shall be deposed and produce documents in this action as a non-party witness.
5. Counsel for Defendant Yosef Taitz shall continue to be included on the Court's docket for purposes of receiving all filings, and shall be permitted to participate in all discovery proceedings.

**IT IS AGREED AND STIPULATED:**

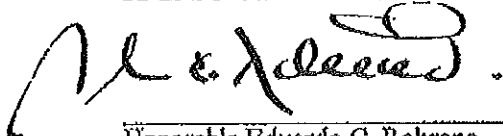


PHILIP J. BERG, ESQUIRE  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
Attorney for the Plaintiffs'



BRAD S. MILLER, ESQUIRE  
COOPER MORRISON & ASSOC, LLC  
325 Chestnut Street, Suite 403  
Philadelphia, PA 19106  
Attorney for Defendant, Yosef Taitz

**IT IS SO ORDERED:**



Honorable Eduardo C. Robreno  
United States District Judge